

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MASOOD HYDER, as Administrator of
the Estate of MOHAMED HYDER, Deceased,

**DEMAND FOR
AUTHORIZATIONS**

Plaintiff,

Docket No.: 08 CIV 6446

- against-

Judge Robinson

STEVE J. KURUVILLA, M.D., ANDREW
FRANCIS, M.D., STONY BROOK
PSYCHIATRIC ASSOC., "EDMUND
MURPHY, R.N." (*identified as person
signing "Final Progress Note/Discharge
Orders" and "Individual Discharge Order Plan"
in Stony Brook Univ. Hosp. medical records
on 12/21/07*), and "JANE DOE, L.C.S.W."
(*name fictitious, full identity currently
unknown, identified only as mental health
care professional signing "Social Work
Progress Note" in Stony Brook Univ.
Hosp. medical records on 12/21/07,
at 17:30*),

Defendants.

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S I R S :

PLEASE TAKE NOTICE that, within twenty (20) days from the date hereof,
you are required to serve the undersigned with duly executed authorizations, which include the
address of the party to whom the authorizations apply, permitting LEWIS JOHS AVALLONE
AVILES, LLP, or their authorized representatives, to obtain copies of the records of:

1. University Hospital at Stony Brook;
2. State University of New York at Stony Brook, Student Counseling Center;
3. State University of New York at Stony Brook, Education records;
4. Records of all schools attended by decedent before Stony Brook;
5. Cornell Westchester;
6. Hasaan Asif, M.D.;

7. Any health care providers who saw decedent for three years prior to December 22, 2007;
8. Cell phone records for phone utilized by decedent;
9. Autopsy records;
10. Health insurance records; and
11. Pharmacy records.


PLEASE TAKE FURTHER NOTICE, that defendants require the full names and addresses of all above-named physicians/institutions to expedite procurement of these records.

PLEASE TAKE NOTICE, that **all authorizations for the release of medical records must be in the proper format and be in full compliance with the requirements of the Health Insurance Portability and Accountability Act (HIPAA) and contain the following statement: " this authorization will remain in effect up to the conclusion of my court case."**

PLEASE TAKE FURTHER NOTICE, that your failure to respond to this notice within a reasonable amount of time or to move on a timely basis for a protective order will result in a motion being made to compel your compliance.

Dated: Melville, New York
August 27, 2008

LEWIS JOHS AVALLONE AVILES, LLP
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By: 
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TO:

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